



Sri Lankan Right to Information Act Implementation Assessment 2019



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Preface

The Right to Information (RTI) Act has been in effect since February 2017, and whilst anecdotally we hear of successes and failures, there has until now been no measure of implementation from a citizen's perspective. It is therefore with great pleasure that I write a preface to this RTI implementation assessment, which is the first of its kind in Sri Lanka.

Whilst Sri Lanka's RTI Law has been ranked as the 4th best in the world by the Centre for Law and Democracy, concerns have been raised about the extent to which public authorities are equipped to deal with RTI requests. The efforts of state entities have been commendable, particularly those of the RTI Commission and the Ministry of Mass Media, with more resources required to further deepen a culture of open government and ensure citizens are aware of their Right to Information. Encouragingly the RTI commitment within the Open Government Partnership (OGP) National Action Plan of Sri Lanka was recognised as the only starred commitment of the government – one which has the potential to be truly transformative – and the dividends of such commitment are slowly coming to fruition.

The completion of this assessment marks not an end point, but a point of commencement on the road to ensuring meaningful RTI implementation. The request and observation methodology adopted, samples the key pillars of democracy, ranging from the judiciary to the executive and extends to all administrative levels of government, ranging from central government and divisional secretariats to local government authorities. It was particularly noteworthy that greater compliance was observed by District and Divisional Secretariats, who represent central government at a local level, than central government ministries themselves. Importantly the assessment also confirms that greater proactive disclosure, particularly within central government, will aid citizens to gather information without the need for a public official, which would mark an important step towards establishing an efficient RTI infrastructure.

In carrying out this endeavor I would like to thank the Institute for Participatory Interaction in Development (IPID) for conducting the assessment with diligence and enthusiasm and the Freedom of Information Advocates Network (FOIANet) for developing the methodology. We look forward to using data gathered through the assessment to feed into the FOIANet's global cross comparative study of RTI implementation. I would be remiss not to acknowledge the support of Mr. Toby Mendel, the Executive Director of the Centre for Law and Democracy, who has been a constant source of advice and guidance to the TISL team, both in this assessment and more generally in working on RTI. Finally, I would like to recognise the tireless efforts of Sankhitha Gunaratne and her RTI team at TISL, who have travelled the length and breadth of the country raising awareness and engaging the public and state officials on RTI, which in turn has brought a grounding perspective to this assessment. I would like to finally acknowledge the invaluable contribution of the Commonwealth Foundation and Diakonia for providing support for conducting and disseminating this assessment.

Asoka Obeyesekere
Executive Director
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July 2019

Executive Summary

The RTI implementation assessment was commissioned by Transparency International Sri Lanka and was carried out by the Institute for Participatory Interaction in Development (IPID). The objective of the assignment was to assess the implementation of the RTI Act, focusing on 3 assessment areas; Proactive disclosure, Institutional measures and Processing of requests.

The approach for the assessment was adopted from the 'Freedom of Information Advocates Network' (FOIANet), which is an international information-sharing network of organizations and individuals working to promote the right of access to information. RTI implementation was assessed in three areas that are provided for under the RTI Act and rules and regulations. The assessment was carried out in a sample of 30 public authorities, divided among different administrative levels. The FOIANet uses a colour grading system together with numerical scoring to rate the assessment areas, authorities and the country. The colour scoring includes 3 colours; Red for a low scoring (needs significant improvements), Yellow for a medium scoring (needs some improvements), and Green for a high scoring (needs little improvement).

The first assessment of the proactive disclosure presented interesting findings, with the lower administrative level of Divisional Secretariats performing best under this category. It was also observed that a standard website design has been provided for all District Secretariats, Divisional Secretariats and other lower level administrative authorities. However, very few authorities have made an effort to develop the website content and regularly update the information.

Authorities under all administrative levels performed well under assessment area 2 (institutional measures), with all authorities except one having a designated information officer for RTI processing. With the presence of a RTI nodal agency and an information commission at the national level, all authorities Sri Lanka earned a yellow grade for the institutional measures undertaken to implement the RTI Act.

Sri Lanka scored another yellow grade in the assessment of the processing of requests, as only 13 of the 30 selected authorities provided a positive outcome to the RTIs that were filed. Out of these 13, only 7 authorities scored a green grade, and all 7 authorities were from the district and divisional administrative levels, which reaffirms that the RTI Act is implemented most efficiently at the lower administrative levels.

The overall scoring of 1 red and 2 yellow grades for the 3 assessment areas qualifies Sri Lanka for an overall country colour code of yellow for RTI implementation. Sri Lanka ranks 4th in the Global Right to Information Rating, which is a reflection of the strength of the RTI legal regime in Sri Lanka. However, the current implementation of the RTI Act has produced a yellow colour grade for the country. While this is an acceptable scoring, and solace may be taken in this fact, it still shows the glaring disparity between theory and application.

The assessment highlighted a general lack of awareness about the RTI Act among mandated officers, lack of proactive disclosure at physical locations of higher administrative level authorities, incomplete and out-dated information on public authority websites and inefficient payment systems for provision of requested information. One of the most direct contributors to the low functionality of the RTI Act is the slow process of converting to a digital system from a paper-based system at government public authorities. The lack of access to digital data prevents authorities from providing timely and complete answers to requests.

The following recommendations are geared towards government authorities and NGOs that advocate for the RTI for better implementation in the future.

- Provide training to relevant authorities and officers under each assessment area
- Develop and distribute manuals and infographics for trainers
- Provide a standard technological software solution to all public authorities to calculate timelines from the date of receipt of an RTI
- Awareness-raising programmes to the public on RTI requests and the rights of citizens
- Modify the international assessment tool to better suit the local context and Act
- Carry out annual assessments

1. Introduction

Article 19 of the Universal Declaration of Human Rights states that *“Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers”*. Many Right To Information (RTI) and Freedom Of Information (FOI) laws and regulations around the world have been based on the latter portion of this article. The lack of right to access information – and, therefore, the right to truth and justice – has been denied to many millions of people all around the world.

More and more in recent years countries that are committed to social development have recognized the value of the freedom of information and have invested in promoting the concepts of government accountability and citizens’ human right to knowledge.

Meaningful access to information is of particular significance in Sri Lanka, as the State holds a lot of power vis-a-vis its citizens, as the largest employer in the country, and as the largest provider of healthcare and education, as well. This results in citizens having to constantly be confronted by the State machinery, and the level of accountability that access to information can bring, arms the citizens with a tool with which to approach this confrontation with confidence.

RTI and FOI laws and policies have been adopted by 116 countries, with at least 25 countries doing so over the last five years. However, implementation remains a challenge. The Sustainable Development Goals (SDGs) that were set in 2015 consists of 17 Goals. **Goal 16** is to promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels. Under **Goal 16**, several Targets have been set, out of which **Target 16.10** is to ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements. To be able to assess this target two Indicators have been set, out of which **Indicator 16.10.2** is to measure the number of countries that adopt and implement constitutional, statutory and/or policy guarantees for public access to information.

This indicator helps assess whether a country has a legal or policy framework that protects and promotes access to information. Ensuring that the public has access to authorities and information compels institutional accountability and transparency. While the existence of a legal framework is very important, it is the implementation of these frameworks that will ensure that a country fulfils **Goal 16**.

1.1 RTI in Sri Lanka

Recommendations were made to the Sri Lankan Government in 1995, on the reform of laws affecting media freedom and freedom of expression. A specially formed Committee recommended drafting a Freedom of Information Act. Following the report of the Committee in 1996, the Sri Lanka Law Commission drafted the Freedom of Information Bill.

The 2000 Draft Constitutional Bill also included a ‘Right to Information’ clause but the Bill was never passed into law. Subsequently, in 2004, a draft of the Freedom of Information Bill was approved by the then Cabinet and tabled in Parliament. This Bill too, was never enacted. It was only in May 2015 that the right of access to information was incorporated into the bill of rights in the Constitution as part of the 19th amendment. Thereafter in June 2016, the Parliament of Sri Lanka enacted the Right to

Information Act No. 12 of 2016 to give meaning to citizens' fundamental right to information. It must be noted that the fundamental right of access to information is guaranteed under Article 14A of Sri Lanka's Constitution and the RTI Act statutorily elaborated the legal framework within which this right shall be exercised. All its provisions came into full force on 3rd February 2017. As of the end of 2018, it was ranked 4th in the Global Right to Information Rating by the Centre for Law and Democracy based in Canada.

The Right to Information Act, known as the RTI Act¹, allows State agencies and other public authorities to ensure accountability towards Sri Lankan citizens through secured information, in order to promote transparency and accountability in the workings of every public authority. It should be noted that the RTI Act of Sri Lanka does not have exemptions specifically for civil and defence bodies.² Officials are therefore entitled to disclose any information which is in the possession, custody or control of a public authority, subject to limited, specific exceptions. The restrictions are mainly focused on the facts associated with privacy, national security, and law enforcement.

If any public authority is satisfied that the larger public interest warrants the disclosure of any exempted information, as mentioned in Part II Section 5 (4) of the Act, citizens are entitled to obtain such information irrespective of the restrictions. The preamble of the Act refers to the 'need to foster a culture of transparency and accountability in public authorities by giving effect to the right of access to information and thereby promote a society in which the people of Sri Lanka would be able to more fully participate in public life through combating corruption and promoting accountability and good governance.'

Sections 7 and 8 of the RTI Act, explain of the roles and responsibilities of an official (nominated as the information officer) attached to a public authority to maintain and preserve information which would facilitate the right of access to information.

Another salient feature of the Sri Lankan RTI Act is that the burden of justifying its actions is placed upon the public authority rather than upon the citizen. The formation of the RTI Commission, where appointments are made on the recommendations of groups like the Editors' Guild, the Bar Association and civil-society groups, is also a special element in the Act.

In the Sri Lankan context, the introduction of the right to information concept is a salutary move to uplift the standards of good governance and to eradicate corruption and bribery. This is also a significant move in terms of the independence of administrative authorities. However, to fully achieve this goal, public awareness, activism of citizens and pro-activeness of community-based organisations and non-governmental organizations are expected to play a significant role.

Despite the constitutional recognition of the right and the subsequent enabling legislation, significant challenges still remain in this regard, such as the people of Sri Lanka remaining largely uninformed of their right to information and of how it may be used, and the inconsistencies faced by the requesters in obtaining the information.

However, Sri Lanka has seen numerous significant successes achieved by citizens within a very short time of the law being operationalized, both in personal and community-level issues, as well as in national issues.

Some of the most successful cases of citizens using the RTI Act have been on basic governance processes at all different administrative levels. Citizens have received information or seen action

¹ The Right to Information Act was introduced in Sri Lanka by Act No 12 of 2016 and certified by the Speaker on August 4, 2016

² Kishali Pinto-Jayawardena, a member of Sri Lanka's RTI Commission and a senior lawyer who has been part of the country's RTI movement, the article titled *Sri Lanka's right to information*, published in Sunday Observer on Sep 30th 2018, <https://rti.gov.lk/media/interviews/161-right-to-information-interview-with-kishali-pinto-jayawardena>

regarding matters such as road development, waste management, recruitment procedures and resource misappropriation, to name a few. Community issues that were ignored for years have often been addressed soon after filing RTIs, such as requests for reconnection of water supply and investigations into illegal land acquisitions. Personal issues such as the amount of funding allocated to families after a natural disaster, examination results and recruitment procedures for government employment have seen results only after taking the RTI route. The RTI Commission has in the vast majority of cases ordered in favour of the disclosure of information, in appeals that are heard before them.³

On the 19th of January 2019, the Right to Information Commission of Sri Lanka (RTIC) commenced public sittings and the hearing of appeals in provinces, starting in Panama, Ampara in the Eastern Province. These public sittings and hearing of appeals will target marginalised communities in Sri Lanka which will help raise awareness regarding the benefits of using the RTI act, and increase active public participation to generate more successful implementation.

RTIs have also been filed at national banks, central ministries and agencies contracting with foreign entities, especially with regard to the construction industry, with many successful outcomes. More recently, RTIs have been filed with the Department of Prisons to obtain the conviction dates and case numbers of several convicted prisoners condemned to death. After an initial hesitation by the department, the RTI Commission issued a directive and the information was released within a week by the Department of Prisons. The RTI appeals were filed on an urgent basis invoking an imminent danger to life and liberty of citizens as provided for by law. This RTI was filed following the President's comments regarding four convicted prisoners being singled out for execution. This too is a result of all mandated bodies within the RTI Act working to ensure that citizens have access to correct information.

Since 2017, RTI trainings and training of trainers have been carried out in central ministries, provincial councils and other public authorities, as vigorous training would be required to ensure the functionality of a concept heretofore alien to the citizens of Sri Lanka. Most recently, awareness programmes such as the programmes organized by the Ministry of Vocational Training in March 2019 and the three- day training of trainers workshop conducted by Ministry of Mass Media together with UNDP have been carried out. TISL has also been carrying out training and awareness raising programmes in several districts in Sri Lanka, which focus more on empowering citizens with regard to using the RTI Act.

The success of these training programmes can be measured by the quality of service provided to citizens when filing RTIs, and by the number of RTIs being filed. Regular assessments would guide the government to improve the functionality of the RTI Act.

1.2 RTI Act implementation assessment

The RTI Act implementation assessment was commissioned by Transparency International Sri Lanka and was carried out by the Institute for Participatory Interaction in Development (IPID). The objective of the assignment was to assess the implementation of the RTI Act, focusing on institutional measures, proactive and reactive disclosure.⁴

³ <http://www.ft.lk/news/RTI-implemented-successfully--more-awareness-required--TISL/56-648841>

⁴ It is important to note that one other implementation assessment has been conducted by the United Nations Development Program (UNDP) with Kantar LMRB in November 2018 titled "Survey on Implementation of the RTI Act in the State Sector". The methodology used in the two assessments vary. The most significant difference is that this assessment makes use of RTIs sent to the sample public authorities to assess compliance.

2. Approach and Methodology

2.1 Approach

An implementation assessment for RTI may look at different segments of the RTI activities in a country. Such an assessment may be used to diagnose the extent to which the public administration is capacitated to respond to requests and to provide information, or to provide an implementation roadmap for the government. This assessment was carried out with the former in mind, to understand the level of functionality of the RTI process in the practical sense.

The approach for the assessment was adopted from the 'Freedom of Information Advocates Network' (FOIANet - http://foiadvocates.net/?page_id=11036), which is an international information-sharing network of organizations and individuals working to promote the right of access to information.

RTI implementation was assessed on three areas that are provided for, under the RTI Act of Sri Lanka and rules and regulations thereunder. The information and activities assessed under the 3 areas are shown in table 2.1.

Table 2.1 – The 3 assessment areas under the RTI Act

| | | |
|--------------------------|-------------------------------|---|
| Assessment area 1 | Proactive disclosure | This is the proactive release of information by public authorities, i.e without a request. |
| Assessment area 2 | Institutional measures | This looked at the institutional measures that have been put in place to support implementation of the RTI law. |
| Assessment area 3 | Processing of requests | This looked at the efficiency of receiving and responding to RTI requests. |

The assessment was carried out in a sample of 30 public authorities, divided among different administrative levels. Out of the 30, 27 authorities were randomly selected from stratified lists of all public authorities currently functioning in Sri Lanka. The purposive selection of 3 public authorities was carried out to ensure that the highest level of the executive, legislative and judicial branches were represented in the overall sample.

Table 2.2 – Number of authorities selected for each administrative level

| | | | | | |
|--------------------------------|-----------------------------------|-----------------------|-------------------------|------------------------------|--|
| Central government authorities | Provincial government authorities | District secretariats | Divisional secretariats | Local government authorities | Executive, legislative, judicial authorities |
| 5 | 7 | 5 | 4 | 6 | 3 |

The selected administrative levels composed of the following types of authorities, as seen in table 2.3.

Table 2.3 – Types of authorities selected for the sample

| Administrative level | Types of authorities selected for the sample |
|--|---|
| Central level | Central government ministries and related departments and institutions |
| Provincial level | Provincial government ministries and related departments |
| District level | District secretariats |
| Divisional level | Divisional secretariats |
| Local government authorities | Municipal councils, Urban councils and Pradeshiya Sabhas |
| Executive, legislative, judicial authorities | Highest national authorities that directly function with each of these mandates |

As this was the first time the FOIAnet assessment has been carried out in Sri Lanka, it was decided to limit the assessment to one sector of authorities, i.e. government sector authorities. As such, private companies, NGOs and INGOs were not included in this assessment. This allowed for an assessment of the government sector at various administrative levels within the limited sample of 30 public authorities. The list of public authorities assessed can be found in **Annex 1**.

The methodology consisted of filing multiple written RTI requests to each authority and visiting the authorities for observations and interviews.

2.2 Methodology

Assessment Area One: Proactive Disclosure

The first assessment area sought the extent to which a public authority proactively discloses information. This was done from two angles. The first angle looked for general information about the public authority and its functions that are readily available. The second angle looked for the availability of information about the right to information itself. This assessment was carried out through observations of the selected authorities' websites and through visits to the physical locations of the authorities, wherever this was accessible.

The tool used for this assessment can be found in **Annex 2**. The assessed information was rated using a five-point scale.

Table 2.4 – Five-point rating scale

| Full | Full to Partial | Partial | Partial to None | None |
|------|-----------------|---------|-----------------|------|
| 100 | 75 | 50 | 25 | 0 |

Assessment Area Two: Institutional Measures

The second assessment area looked into the extent to which institutional measures have been put in place to assist with the implementation of the RTI Act. This was divided into two sections. The first focused on the overall framework for implementation within Sri Lanka and was assessed based on desk reviews of the Act and related available documents. The second section focused on measures taken by individual public authorities. This data was collected through short interviews with the information officers of the selected public authorities. The tool used for this assessment can be found in **Annex 3**. The assessed information was rated using a three-point scale.

Table 2.5 – Three-point rating scale

| Yes | Partially | No |
|-----|-----------|----|
| 100 | 50 | 0 |

Assessment Area Three: Processing of Requests

The third assessment looked at the extent to which requests for information were being responded according to the guidelines provided by the RTI Act and rules and regulations thereunder. The methodology involved making two requests for information to each public authority. The requests were only in the format of written RTI – 01 forms and inquired about information relevant to the selected authority. The requests were filed in Sinhala, Tamil or English language, based upon the general language preference of the geographical location. The requests were posted to the relevant authorities, and all responses were requested in the written format (printout or email).

The process was assessed under 4 categories (process steps);

- 1) Provision of receipt** – Under Section 24 (3) of the RTI Act, the information officer is obligated to immediately provide an acknowledgement of the request to the citizen.
- 2) Timely response** – Under Section 25 (1) and (2) of the RTI Act, the information officer must make a decision and inform the requester within 14 days to either provide the information requested or to decline. When a decision has been made to provide the information requested for, the information must be provided within 14 days of arriving at such decision.
- 3) Information in desired format** – Under Section 27 (1), (2) and (3), the information must be provided in the desired format, unless the format causes harm to the document, in which case the information officer must assist the requester to obtain the information in another format.
- 4) Fees charged** – Under Section 14 (c), (d) and (e), the information officer may charge the requester a minimal fee for providing the information in the requested format, as prescribed in Gazette No. 2004/66 - Friday, February 03, 2017, Rule 4.

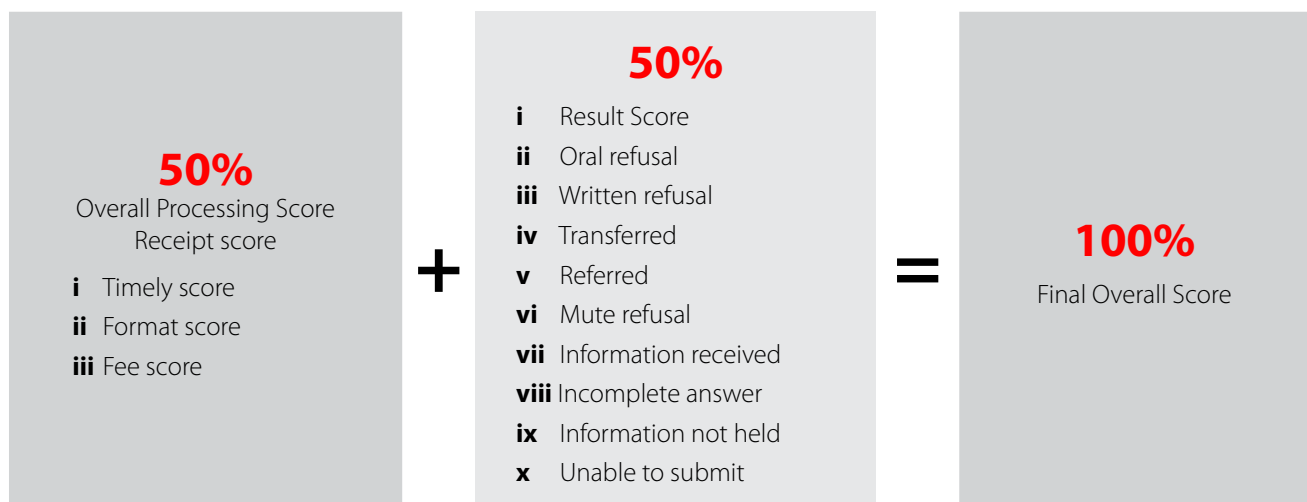
Once a request was filed with a selected authority, the response was measured at each of the above process steps. The 30 authorities were mailed 60 RTI requests (2 per authority) using regular post. The performance of an authority was measured by averaging the score of both the requests. The tool used for this assessment can be found in **Annex 4**. The assessed information was rated using a three-point scale.

Table 2.6 - Three-point rating scale

| Yes | Partially | No |
|-----|-----------|----|
| 100 | 50 | 0 |

The final overall score for the assessment area 3 was calculated by averaging the processing activities score (overall processing score) and the actual outcome score (result score). This places 50% of the weight on the process score and 50% of the weight on the result score.

Figure 2.1 Formula for the final overall score for assessment area 3



2.2.1 Scoring

For each assessment area, the overall score of each authority was calculated, which was then averaged by the total number of authorities to produce an overall score for the assessment area. These 3 overall scores were then rated against a colour grade.

Table 2.7 – Colour grade rating scale

| Red | Yellow | Green |
|------|--------|--------|
| 0-33 | 34-66 | 67-100 |

This methodology allowed for the generation of 3 overall color grades, one for each assessment area, as well as color grades for individual authorities. Table 2.7 shows the possible overall country implementation colour grading outcomes for each assessment area.

The single overall country color grade was allocated using the following table 2.8. For example, if a country's final colour grading was 2 red assessment areas and one yellow, the country would be graded as having a final colour grading of red (Combination 2 in Table 2.8). In the same manner, if one assessment area was graded yellow and two green, the overall country colour grading would be green.

Table 2.8 – Overall country color grade rating system

| | | No. of red | No. of yellow | No. of green |
|-------------------------|----------------|------------|---------------|--------------|
| Final score color grade | Combination 1 | 3 | 0 | 0 |
| | Combination 2 | 2 | 1 | 0 |
| | Combination 3 | 2 | 0 | 1 |
| | Combination 4 | 1 | 2 | 0 |
| | Combination 5 | 1 | 1 | 1 |
| | Combination 6 | 0 | 3 | 0 |
| | Combination 7 | 0 | 2 | 1 |
| | Combination 8 | 1 | 0 | 2 |
| | Combination 9 | 0 | 1 | 2 |
| | Combination 10 | 0 | 0 | 3 |

The filing of RTIs was started from the 26th of February 2019, and time was allocated for responses till the 3rd of May 2019. Responses received after the 3rd of May were not included in the assessment, as they would not qualify for a satisfactory timely response.

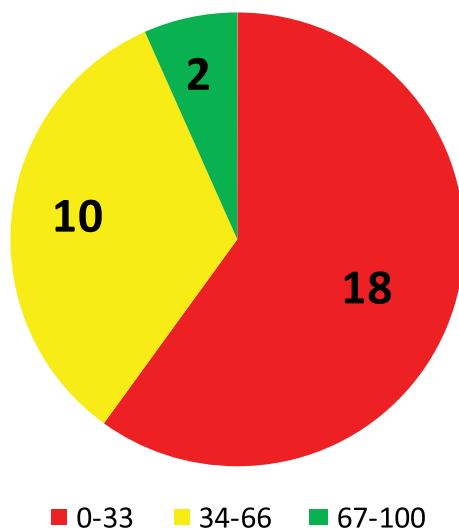
3. Findings

The findings of the study are first presented under each assessment area for the 30 selected authorities, after which the final country scoring is analyzed.

3.1 Assessment area 1 - Proactive Disclosure

The final result for the individual authorities under the proactive disclosure assessment was based on the combined observations of physical visits and the corresponding website wherever available. Of the selected authorities, 6 did not have a functioning website hence the proactive disclosure was scored only using the field observations. With regard to field visits, 3 authorities could not be freely accessed due to being high-security zones and were assessed solely based on their website content. The figure 3.1 shows that the majority of authorities scored low in proactive disclosure, with 18 authorities scoring a red grade.

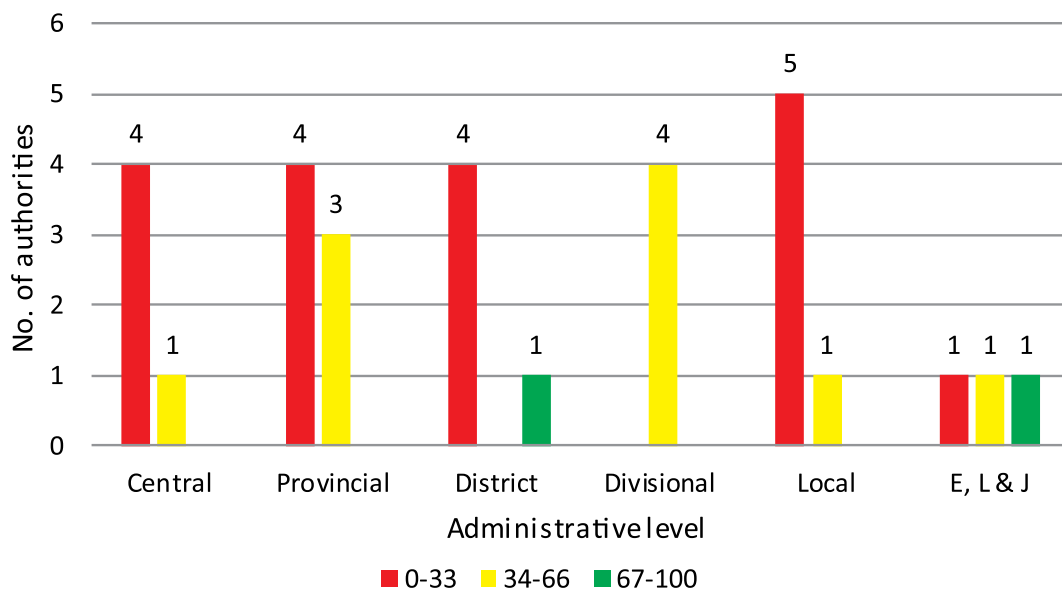
Figure 3.1 Proactive disclosure results for selected authorities



An interesting finding was that the lower administrative level of Divisional Secretariats performed the best under this category, as seen in figure 3.2. The field visits documented the displaying of information in the relevant language for the benefit of any visiting citizen. Information with regard to officers and their contact information, the services offered, relevant forms and deadlines for submissions and relevant payments were all clearly displayed. As Divisional Secretariats are primary contact places between citizens and the government, it is vital that proactive disclosure is implemented well. The relevant websites also contained some information required under the proactive disclosure regulations under the Act. Of the 6 local government authorities assessed, only 1 possessed a functioning website.

It was observed that a standard website design has been provided for all District Secretariats, Divisional Secretariats and other lower level administrative authorities. However, very few authorities have made an effort to develop the website content and regularly update the information. Responsible officers must be duly trained and provided with assistance to ensure that the websites are properly managed.

Figure 3.2 Proactive disclosure results by administrative level



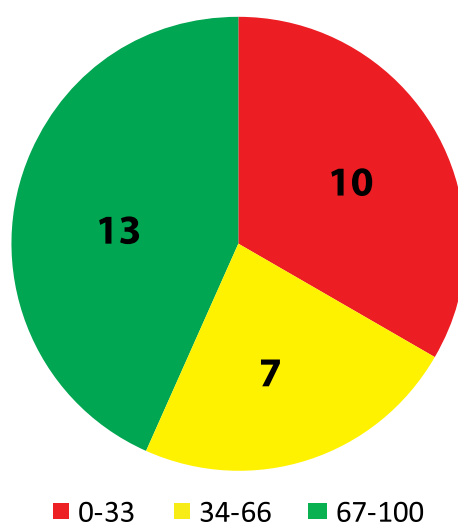
The field visits to the central level authorities showed that very little information is displayed to assist a visiting citizen. Rather, the ministries were seen to rely upon the front desk officer/reception officer to guide the citizen. As central authorities such as ministries are visited by citizens of different backgrounds, it is important that relevant information and guides are displayed in both national languages as well as English. The provincial level authorities generally had websites with information required under the RTI Act, though not completely compliant with the full requirements.

The field observation team had a challenging time during the field visits for the observation of proactive disclosure compliance which showcased the anti-NGO sentiments within most public authorities. The government authorities argued that prior permission must be obtained, even though the observations were carried out only in public areas open to citizens. In one instance, an authority filed a police complaint against the field observations team. The team had made the visit 3 weeks prior to the Easter Sunday attacks in Sri Lanka, and the authority filed a complaint 3 days after the attack, accusing of suspicious loitering.

3.2 Assessment area 2 - Institutional Measures

The final result for the individual authorities under the institutional measures assessment was a combination of the national level institutional measures taken together with the individual measures taken by the authorities to implement the RTI Act. The majority of the authorities scored favorably in this assessment with only 10 authorities scoring a red grade in this category, as shown in Fig. 3.3.

Figure 3.3 Institutional measures results for the selected authorities

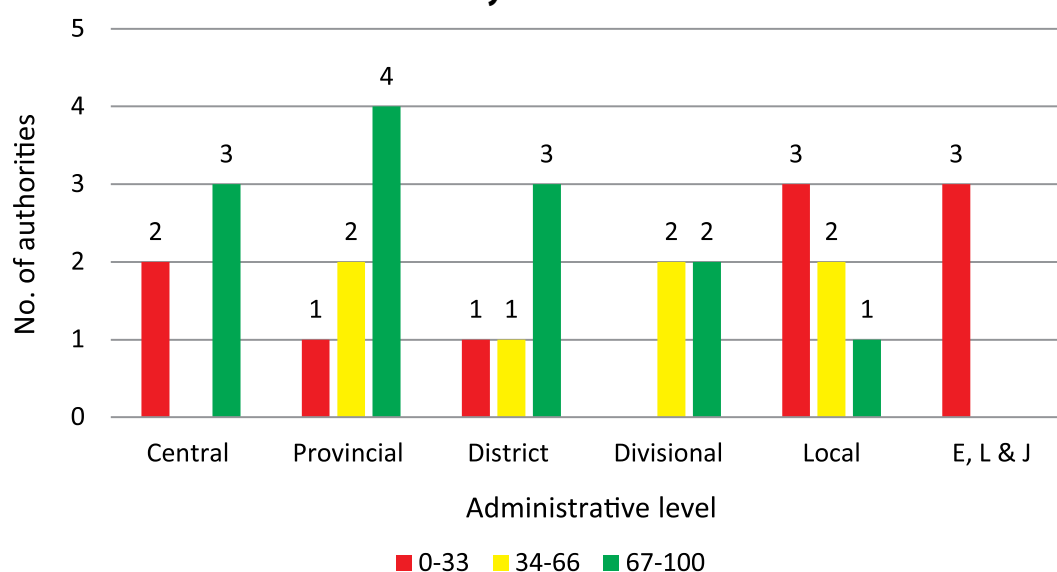


Authorities under all administrative levels performed well here, with all authorities except one, having an officer (Information Officer) in place who is responsible for the implementation of the RTI Act. It was observed that the central and provincial authorities often have designated several officers for this purpose.

It must be stated that 7 out of the 10 authorities that scored a red grading could not be contacted through the listed contact numbers on their relevant websites. It was decided to score them with a red color grading as inability to access the Information Officer through the official contact number was contradictory to the purpose of the RTI Act. Of these 7 authorities, 2 authorities were at the central administrative level, 1 at the district level, 1 at the local government level and all 3 authorities of the executive, legislative and judicial administrative level also could not be contacted.

However, the interviews showed that there was a general lack of enthusiasm with regard to the RTI Act, and that the Information Officers' attitude towards the extra workload was not positive. Most Information Officers at the district level and other lower administrative levels stated that they rarely receive RTI requests. This can be due to the lack of awareness among citizens regarding the RTI Act.

Figure 3.4 Institutional measures results by administrative level



The score for the individual authorities was calculated by combining the scoring from the national level institutional measures (presence of a RTI nodal agency and an information commission) with individual authority level institutional measures (appointment of an Information Officer, relevant training provided etc.) As Sri Lanka has established both a nodal agency as well as an RTI commission, a high score was added to each authority's individual score when calculating the overall institutional measures. This was the main factor in producing overall positive results for the authorities. Only 8 of the 30 selected authorities prepare and publish annual reports, including statistics on the RTI requests received, which is a requirement under section 10 of the RTI Act. As a result of this the RTI Commission is not in a position to publish a report with the national statistics on RTI requests.

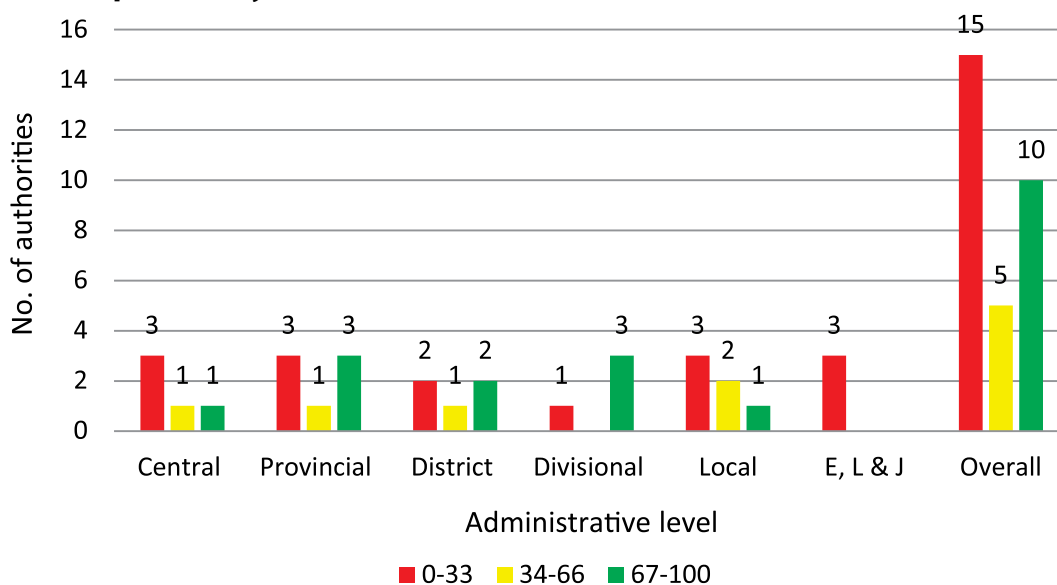
3.3 Assessment area 3 - Processing of Requests

The findings of assessment area 3 are presented below under each subsequent stage in the 'processing of requests' activity steps.

Stage 1: Provision of Receipt

Of the 30 selected authorities, only 10 provided a receipt of acknowledgement of the request immediately upon receiving the RTI request, as the first step in the RTI process. As seen in figure 3.5 below, the majority of the authorities did not acknowledge the RTI request. Overall, of the 15 authorities that did send a receipt, 5 authorities sent it together with the letter informing of the decision to provide information or with the information itself. However, in these cases, the receipt of acknowledgement was greatly delayed, and no longer served the intended purpose, as such scoring a yellow grading as seen in figure 3.5 below. An interesting observation was the lack of a receipt from the 3 key authorities selected under the executive, legislative, judicial administrative levels.

Figure 3.5 Receipt score by administrative level



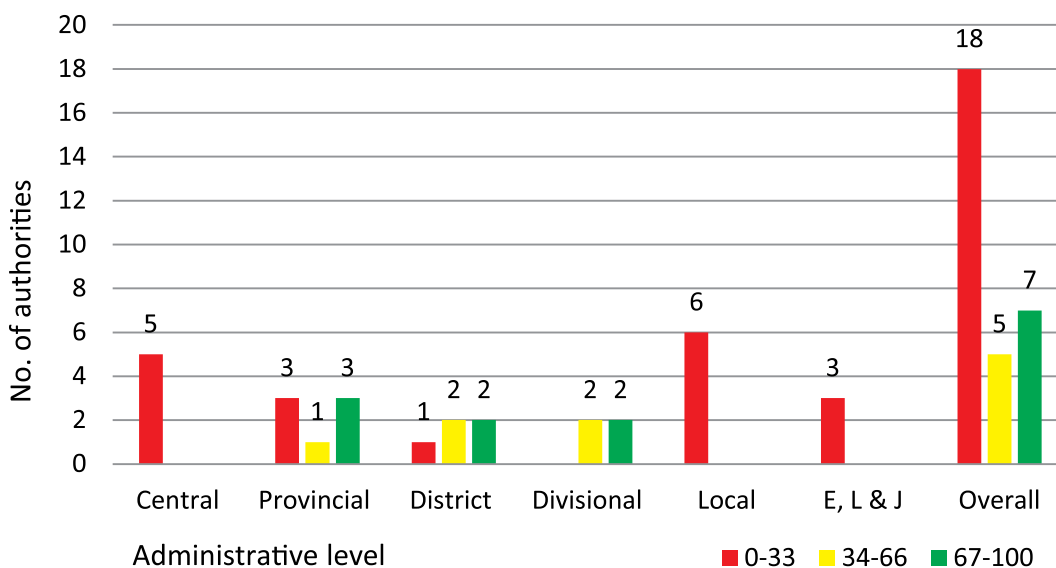
The authorities, other than the executive, legislative, judicial level authorities, generally showed a common, mixed pattern of responding across the administrative levels, with a mediocre acknowledgement rate. The executive, legislative, judicial level authorities all scored red as there was either no acknowledgement at all (2 authorities) or the acknowledgement was extremely delayed (1 authority).

To ensure that the 15 authorities that did not respond received the RTI requests, a second round of requests were posted under registered post. Provisions were made for the possibility of the authority not receiving the request through normal post, however, the authorities failed to acknowledge the requests for a second time.

Stage 2: Timely response

The authorities were then assessed based on the timely response to the RTI request. For this assessment, either the letter informing of the decision to provide or refuse the information or the provision of the requested information without a letter informing of decision to provide was taken as a valid response. As seen in figure 3.6 below, the general outcome was negative. 18 of the selected authorities did not respond in time, often not responding at all. Of the 6 RTI requests submitted to the 3 authorities selected under the executive, legislative and judicial administrative levels, 4 were never acknowledged nor provided the requested information, and 2 were acknowledged and letters were sent with partial information for 1 request and a written refusal for the other, but were greatly delayed, causing all 3 authorities to score red in this category as well.

Figure 3.6 Timely score by administrative level



The central administrative level authorities were also not mindful of the time factor in responding to the requests, with all 5 authorities scoring red in this category. Among the central level authorities, 2 authorities transferred the request to another department, citing mandate over requested information as the reason. Of the requests submitted to the provincial level authorities, 2 authorities informed via letter that the information was not under their purview and referred the requester elsewhere. In one instance, the authority cited a referral that requested the RTI to be filed to a department in the same building only several floors below. The default action that an authority should take in such an instance, as per Regulation 4(6) is a transfer, removing the burden from the citizen, not a referral. 1 Divisional Secretariat requested for a time extension to provide the information, citing the time required to gather the information from the relevant documentation, which is permissible by law if the information sought is voluminous. However, the information requested from all authorities were not voluminous in nature. Below are some of the RTIs filed, which show that the information requested was often information that should be readily available within the authorities.

- ① Number of Cooperatives currently functioning in Sri Lanka.
 Number of Cooperatives functioning in Sri Lanka, segregated by sector.
 Revenue produced by the Cooperative societies for the year 2017-2018, segregated by sector and province.
 Number of Cooperative development officers by Province.
- ② Number of District Child Development Committee (DCDC) meetings held for the years 2016-2018, with dates held List of attendees of each of these meeting, meeting discussion topics (summary) and follow-up actions taken.

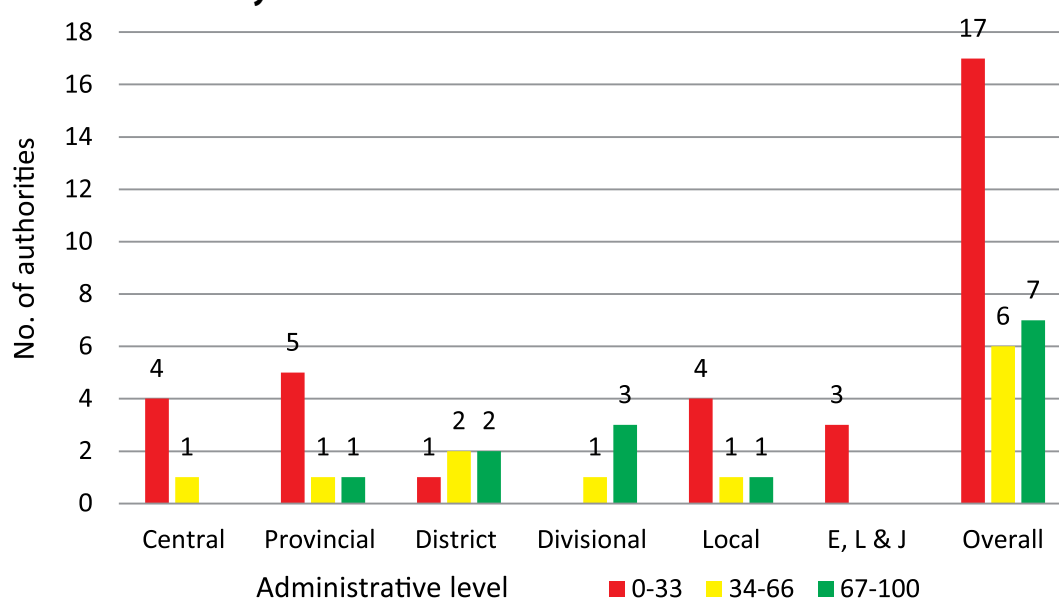
All the local government administrative level authorities delayed their response, which may be linked to the general lack of training and interest of the information officers as observed during the institutional measures assessment of those authorities.

It must be noted that the RTI requests were sent through regular post, with the responses arriving in the same manner. It was difficult to score the timeliness factor as it became apparent that delays in the postal services greatly contributed to the communication time periods. However, the mandated 14 days of initial response could still be adhered to, in calculating time from the date of receipt to the date of posting the information.

Stage 3: Information in Desired Format

This stage assessed the format in which the requested information was provided. However, if a request was refused, and the refusal was informed through the format request in the RTI form, marks were given favourably, as the format was correct. Mute refusals and refusals over the telephone were scored low and given a red or yellow grade respectively. As seen in the figure 3.7 below, the 17 authorities that scored a red colour grade are authorities that have failed to comply with the process from stage 1 onwards, and a mute refusal was scored as the wrong format to inform of such refusal.

Figure 3.7 Format Score by Administrative Level



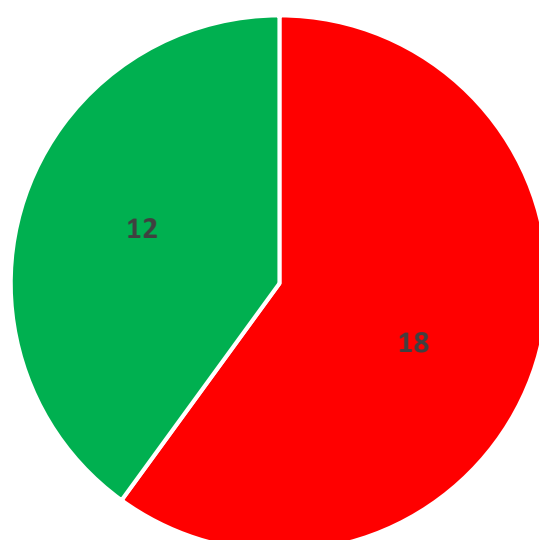
The central administrative level authorities scored low in this category, with only one authority responding to 1 of the 2 RTI requests filed. The District Secretariats and Divisional Secretariats scored better under this category, which again highlighted the efficiency of the lower administrative levels with regard to RTI implementation.

Stage 4: Fees Charged

The final stage in the processing of requests was the assessment of any fees charged, if necessary, for the provision of requested information. Authorities requested fees when the requested information took up several pages of paper, as is allowed under the RTI regime. When the information required only 3-4 pages, the authorities provided the information free of charge. None of the authorities requested an unjustifiable amount of payment.

As seen in figure 3.8 below, 12 authorities provided information, out of which 9 authorities provided it free of charge whereas the other 3 authorities requested a nominal amount of payment in accordance with the prescribed fees.

Figure 3.8 Fee score for selected authorities



■ No response to request, default no charge ■ Provided free of charge or for correct fee

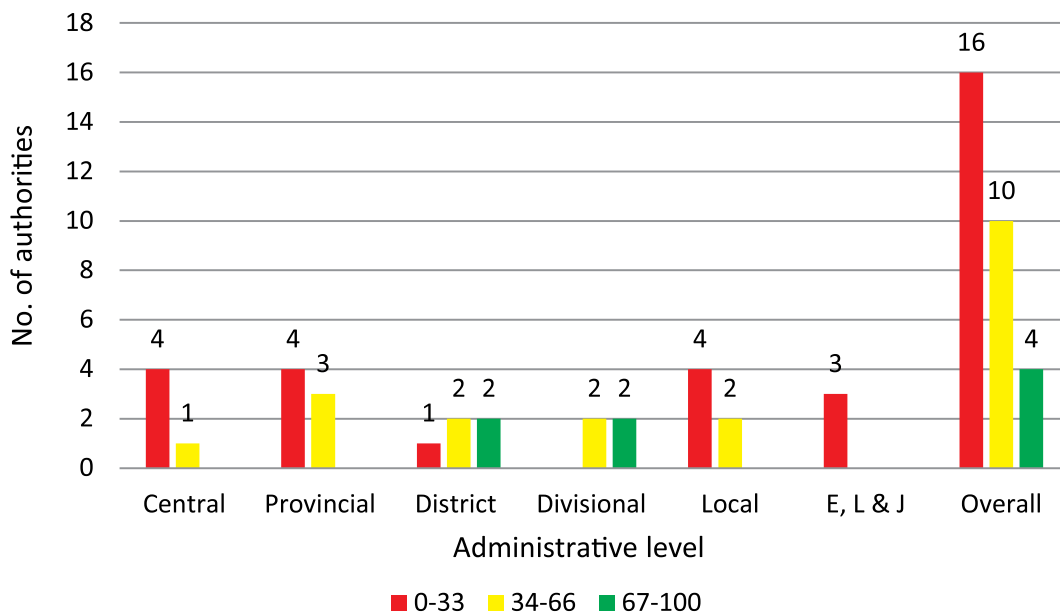
The payment method for the printouts of the requested information caused confusion and showed a lack of efficiency. The authorities that requested payment were vague with how to proceed with the payment. Requests to deposit in a bank and send the bank slip were not followed up with information regarding bank information. In one instance, the Information Officer requested a physical visit to the authority for a direct payment. Difficulty in making a payment should not hinder the provision of information and the right of the citizen.

Overall Processing Score

The overall processing score looked at the 'process' of receiving and responding of RTI requests and was calculated by averaging the score for the 3 stages scored under assessment area 3. The figure 3.9 below shows that the majority of the authorities did not complete the processing of RTI requests to a satisfactory level, with 16 authorities scoring a red colour grade. The 3 executive, legislative and judicial administrative level authorities scored red as the authorities failed to complete a single stage efficiently. The central and provincial administrative level authorities also scored low with an inefficient

approach to RTI implementation. The district and divisional level authorities performed well in all stages of the processing of requests and would improve their services greatly with some further training and guidance. Out of the 30 selected authorities, only 4 scored a green colour grade which shows the status quo of the RTI Act implementation process currently in Sri Lanka.

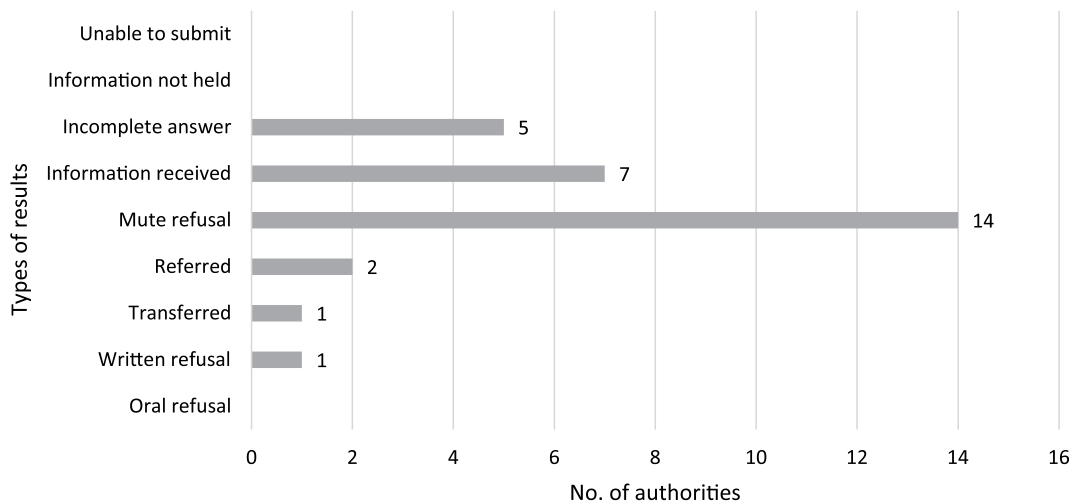
Figure 3.9 Overall Processing Score by Administrative Level



Results Score

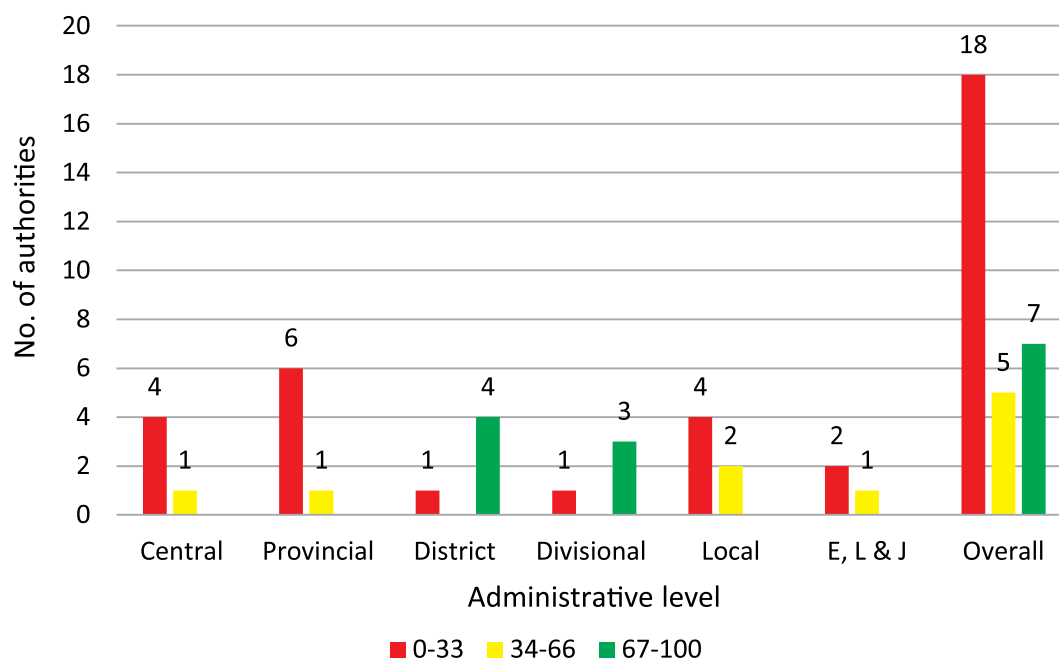
The results score looks at the final outcome of the RTI requests in terms of the actual response to the RTI request. As seen in the methodology in section 2.2, the results were recorded according to the 9 types of possible results. Of the 9 possible results, only 3 results can be considered as a positive (or partially positive) outcome; transferred, information received and incomplete answer. The following figure 3.10 shows the types of responses generated through the filing of RTI requests to the 30 selected authorities. Only 13 of the selected authorities provided a positive outcome. 14 of the 30 authorities provided no communication and were recorded as mute refusals. One written refusal was provided by a provincial administrative level authority. The refusal was scored as a 'written refusal' for the purposes of this assessment, although the authority failed to specify their reason of refusal. It is mandatory under the RTI Act to clarify on what grounds a request is refused.

Figure 3.10 Types of results from selected authorities



The figure 3.11 below shows the results score for the selected authorities by the administrative level. The authority that transferred the RTI request was also given a red colour rating, as the information was never received from the relevant transferred authority, which led to 18 authorities receiving a red colour grade. Out of the 30 authorities, 7 authorities were given a green colour rating, which was due to the provision of complete answers for the requested RTIs.

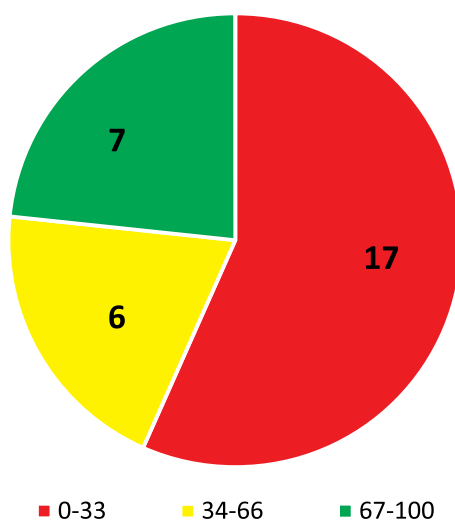
Figure 3.11 Results score by administrative level



Final overall score

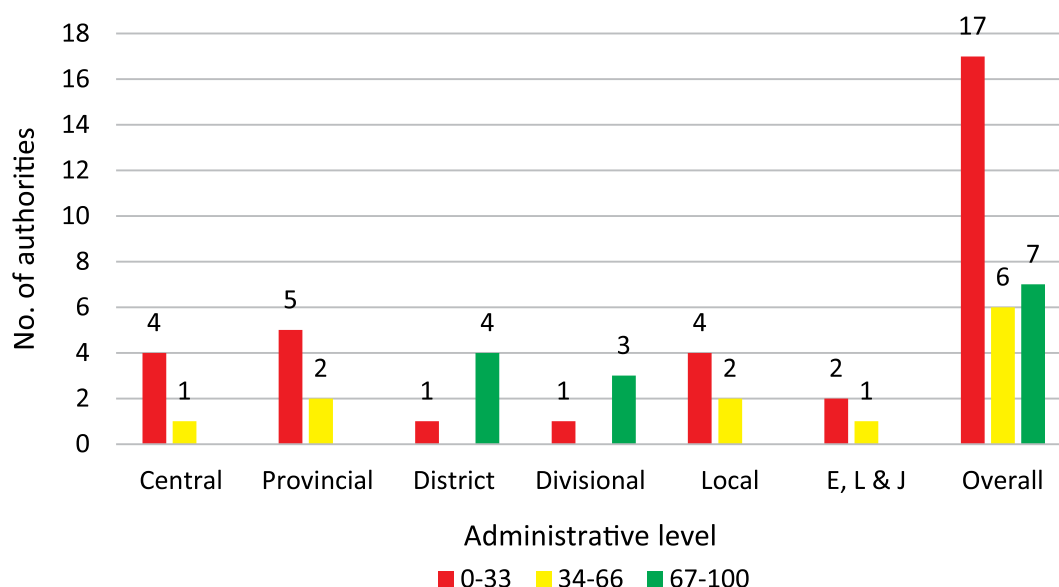
As mentioned in section 2.2 under methodology, the final overall score for the assessment area 3 was calculated by averaging the score from the 4 steps under the processing of requests and the result score (provision of information). The following figure 3.12 shows that 17 of the selected authorities were given a red colour rating which is due to an inefficient RTI implementation process.

Figure 3.12 Final overall score for the processing of requests results for the selected authorities



The figure 3.13 below shows that the 7 authorities that scored a green rating were from the district and divisional administrative levels, which reaffirms that the RTI Act is implemented the most efficiently at the lower administrative levels.

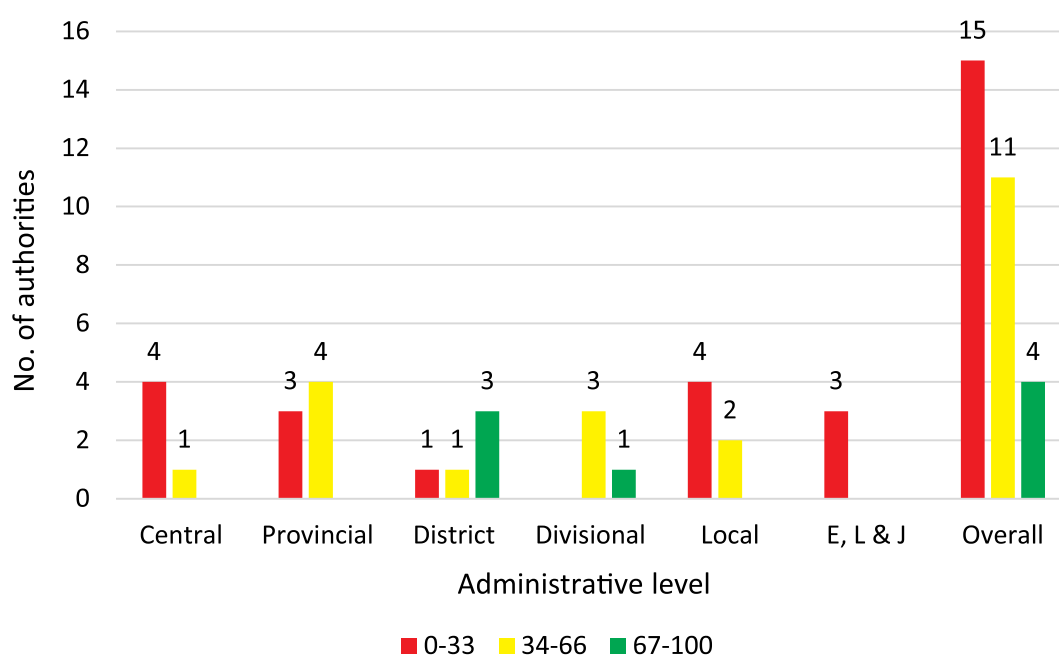
Figure 3.13 Final overall score by administrative level



3.4 Overall assessment: Final Grading

The final colour grading for each authority was obtained using the final scoring colour grading stated in section 2.2 in methodology. The 3 colour grades obtained by each authority for each assessment area was measured against the colour grading table and a final colour grade was awarded to each authority. Below figure 3.14 shows the colour grades of the authorities by administrative level.

Figure 3.14 Individual final grading by administrative level



The final scoring of each assessment area for the country was the average score of the 30 selected authorities for that assessment area. Below in table 3.1, the final country score for each assessment area

can be seen. The scoring of 1 red and 2 yellow grades qualifies Sri Lanka for an overall colour code of **yellow** for RTI implementation.

Table 3.1 Overall assessment of all 3 assessment areas with final colour grade

| Assessment Area 1 | Assessment Area 2 | Assessment Area 3 | Final Grade |
|----------------------|------------------------|------------------------|-------------|
| Proactive disclosure | Institutional measures | Processing of requests | |
| 32 | 53 | 35 | |

4. Conclusions and recommendations

Sri Lanka ranks high in the Global Right to Information Rating, which is a reflection of the strength of the RTI legal regime in Sri Lanka. However, the subsequent implementation of the legislation raises significant challenges that must be addressed to ensure that the RTI Act serves its purpose. The current implementation of the RTI Act has produced a **yellow** colour grade for the country. While this is an acceptable scoring, and solace may be taken in this fact, it still shows the glaring disparity between theory and application.

4.1 Observations and conclusions

The study produced the following observations and conclusions;

- A general lack of awareness about the RTI Act - in some instances the knowledge was limited to only having heard of the name of the Act - was evident throughout all 3 assessment areas. The Information Officers did not place any value on the Act and seem to not realize the significance it holds, not only to the personal benefit of a citizen and to communities, but also to ensure that the government actions are held accountable. The successful implementation of the RTI Act directly contributes to the success of Sri Lanka achieving the SDGs.
- Proactive disclosure was seen to be implemented well at lower administrative levels than at higher levels. An attitudinal change would need to be brought about to the authorities and responsible officials to improve this area. The infrastructure style followed by the central ministries and provincial ministries does not seem service oriented. Effective proactive disclosure on the physical locations of the authorities could contribute to more efficient functioning of the authorities, as citizens would be able to gather the preliminary information without the need for an officer to be involved.
- It was observed that a standard website design has been provided for all District Secretariats, Divisional Secretariats and other lower level administrative authorities. However, very few authorities have made an effort to develop the website content and regularly update the information. It could be argued that lower administrative level authorities have little need for a functioning web presence. However, with each generation becoming more and more digital savvy, steps should be taken to ensure that government authorities are technologically updated. An efficient digital portal can help reduce the daily visits of citizens to the authorities and allow the authorities to provide services in a timely manner.
- The payment method for the printouts of the requested information caused confusion and showed a lack of efficiency. There was a lack of proper communication with regard to the options available for a payment. The common understanding among the Information Officers was that the requester would need to physically present themselves at the authority to make the payment, even though other options may be employed as per the Regulations. This causes inconvenience

to a citizen who may reside at a considerable distance from the authority. The Information Officers were also not able to provide a standard guideline to be used for bank deposits. Difficulty in making a payment should not hinder the provision of information and the right of the citizen.

- An efficient system to make bank deposits/online transfers should be developed and incorporated in to the administrative system to ensure that completion of the RTI is not hindered by an external factor.
- Information Officers must be trained on how to guide a citizen to make the necessary payments. The letter sent to the requester should provide the different options available for payment.
- The RTIs were sent through normal post, as the study was conducted to assess the implementation efficiency and response experienced by an average citizen. The time frames allocated by the RTI Act with regard to response and extension periods could not be followed up with, as the Information Officer claimed that RTI requests were received weeks after posting, even for instances where the authority was within the general area of Colombo. The combined delays of receiving the requests (as stated by the Information Officers) and receiving the requested information raised difficulties when assessing the timely factor of the RTI implementation, as the external factor of the postal service delay influenced the outcomes.
- Several authorities directly contacted the requester by phone, with several inappropriate enquiries such as to confirm the citizenship of the requester, the reason for the inquiry and to question why the requester has not gone to a certain authority to get the data instead of disturbing them. These experiences showed that the Information Officers were not aware of the RTI Act and the rights of the citizen to access information. The Officers treated the inquiries from a position of power, and not from a place of service. The citizens of Sri Lanka remain largely uninformed of their right to information and of how it may be used. The few that do approach the system through the RTI will be greatly discouraged by the negative attitudes of Information Officers.
 - Information Officers must be provided with extensive training with regard to not only the implementation process, but also regarding the rights of the citizen of Sri Lanka to access information.
 - It should be the responsibility of the authorities and the Information Officers to raise awareness regarding RTI, through the proper implementation of the proactive disclosure regulations in the RTI Act. This must be encouraged during trainings.
- The selection of high-level administrative officers as Information Officers has positive and negative impacts. The officer is able to independently decide whether to provide the information or not. However, this officer does not always have direct access to the requested information and will defer the approved request to the subject relevant officer. This has become an informal secondary step in the RTI request processing mechanism within authorities and leads to delays.
- Once RTI requests are approved by the Information Officer, they are handed over to the sector-relevant officer by the Information Officer in order to gather the actual information. It was often this officer – who has generally not received training or awareness with regard to RTI - who contacted the requester with inappropriate inquiries, and it was understood that these officers resented the extra work that was caused by the RTI request.
- The slow process of converting to a digital system from a paper-based system hampers the efficiency of the RTI Act greatly. Currently, authorities at all administrative levels maintain all documents and data in a paper-based filing system, which leads to large amounts of data being stored in unreachable folders. When requesting for data relating to several years, authorities

struggled to search and gather the data, and often requested for time extensions. It can be presumed that the mute refusals of the majority of authorities could also stem from the extra workload that is created by an RTI request. The lack of access to digital data prevents authorities from providing timely and complete answers to requests. The process of gathering the data for a request can be a demotivating factor for an officer, who is often a high-ranking official with many other responsibilities to attend to.

- National level actions must be taken to push authorities for transition from a paper-based system to a digital system. This is not only useful from the perspective of implementing the RTI Act, but also contributes to the maintenance of accurate and traceable data.
- Monitoring & Evaluation reports and data should be digitally stored and accessible to all relevant authorities to ensure that evidence-based decisions are taken by governments. This will allow for transparency in government activities which would allow the RTI process to be implemented smoothly.
- The assessment highlighted an ongoing issue in the country with regard to the voluntary segregation of communities and the lack of ethnic representation in all administrative levels. Submitting an RTI request in a language that is not the predominantly spoken language within a community to an authority located in that community, caused delays and adverse reactions amongst the officers. The Information Officer would state that the delays could be avoided if the requests were filed in the local language. This could lead to further isolation of a minority group and borders on racial discrimination.
- The international tool used for the assessment was not 100% in line with the Sri Lankan RTI process. The tool allows for a standardized measurement of Sri Lanka against other countries which will contribute to a global ranking system. This justifies the use of the un-adapted tool for the first assessment of such kind in Sri Lanka. However, in future a contextualized tool would provide a better overview of the efficiency of RTI implementation and could produce data that could be used to improve the system within the parameters of the local RTI Act.

4.2 Recommendations

The following recommendations are geared towards government authorities as well as NGOs that advocate for the RTI.

- Provide training under each assessment area
 - Interactive and participatory training programmes must be developed and carried out in all administrative levels. The breakdown of the assessment area in to proactive disclosure, institutional measures and processing of requests can be replicated in the training manuals as well, as these are key categories that must be given due attention.
 - The training should not be limited to the Information Officers, and should include officers across all sectors in government authorities, as these officers assist the process by providing the requested information to the Information Officers.
- Provide a standard technological software solution to all public authorities to calculate timelines from the date of receipt of an RTI.
- Provide manuals for trainers and info graphics
 - The training manual for RTI produced by Transparency International Sri Lanka (TISL), Sarvodaya and Commonwealth Foundation was well received by the officers.

- Info-graphics should be used to produce awareness-raising materials that can be distributed among officers as well as citizens.
- Awareness-raising programmes on RTI requests as well as rights of citizens
 - Along with training programmes, awareness raising programmes must also be carried out. These awareness raising programmes should aim to change the thinking and behaviour of the officers implementing the RTI Act, as biased and closed-minded approaches and definitions of service hinder the success of the Act. It is important to change the attitudes of government officers with regard to the general rights of a citizen, especially the RTI.
- Modify the international assessment tool to better suit the local context and Act
 - Transparency International Sri Lanka should take into consideration the adaption and contextualization of the international assessment tool. This will allow the country status quo to be assessed in a more meaningful way, so that the findings can be used to advise and guide the successful implementation of the RTI Act.
- Carry out annual assessments
 - It is strongly recommended that annual assessments of the RTI implementation are carried out. The documentation of the annual progress will assist in decision-making with regard to the efficiency of the current Act and future policy.

Annexes

Annex 1 – List of public authorities assessed

1. Ministry of Postal Services & Muslim Religious Affairs
2. Ministry of Industry and Commerce, Resettlement of Protracted Displaced Persons and Co-operative Development
3. National Disaster Management Council
4. Institute of National Security Studies of Sri Lanka
5. Sri Lanka Navy
6. IT Resources Development Authority (Western Province)
7. Chief Secretary's Office (Southern Province)
8. Department of Buildings (Eastern Province)
9. Department of Probation and Child Care Services (Northern Province)
10. Planning and Monitoring Division (Central Province)
11. Public Service Commission (North Western Province)
12. Ministry of Co-operatives (North Central Province)
13. District Secretariat - Matara
14. District Secretariat - Kandy
15. District Secretariat - Anuradhapura
16. District Secretariat - Jaffna
17. District Secretariat - Mullaitivu
18. Divisional Secretariat - Sri Jayewardenapura Kotte
19. Divisional Secretariat - Nintavur
20. Divisional Secretariat - Puthukkudiyiruppu
21. Divisional Secretariat - Valikamam
22. Colombo Municipal Council
23. Jaffna Municipal Council
24. Yatinuwara Pradeshiya Sabha
25. Nintavur Pradeshiya Sabha
26. Puthukkudiyiruppu Pradeshiya Sabha
27. Vavuniya Urban Council
28. Office of the Cabinet of Ministers
29. Parliament of Sri Lanka
30. Supreme Court of Sri Lanka

Annex 2 – Proactive disclosure (Availability of institutional information)

| Type of information | Indicator | Published (Full/Full to Partial/Partial/ Partial to None) | Data Source (website or location of information) |
|---|--|--|---|
| Institutional | Are functions of the authority and its powers published? | | |
| Organisational | Is Information on personnel, names and contacts of public officials published? | | |
| Operational | Are any authority strategies, plans or policies published? | | |
| Legislation | Are the laws governing the authority's operations published? | | |
| Activities and Service Delivery | Are descriptions of the main activities undertaken and services offered by the authority, including, for the latter, any forms required to be filled out and deadlines for application, published? | | |
| Budget | Is information about the projected budget, actual income and expenditure, and/or audit reports published? | | |
| Public Procurement and Contracts | Is detailed information on public procurement processes, criteria, outcomes of tenders, copies of contracts, and reports on completion of contracts published? | | |
| Participation | Is information about the mechanisms and procedures for consultation and public participation published? | | |
| RTI information | Is an annual report on the status of implementation of the RTI law published including number of requests granted, refused and time taken to respond? | | |
| How to make an RTI request | Is information on how to make an RTI request published, including contact details? | | |
| Costs for publications | Is information about the costs/fees for paying for photocopies of information? | | |
| List of information requested | Is information related to RTI requests which were granted published? | | |

Annex 3 – Institutional measures

| Question/ Issue | Yes/No/Partially | Remarks |
|---|------------------|---------|
| Overall framework for Implementation | | |
| Has government established an RTI Nodal Agency? <i>(If yes, comment on its roles and functionality)</i> | | |
| Has government established an independent RTI oversight body, such as an information commission? <i>(If yes, comment on its work and how effective it has been)</i> | | |
| Implementation by Individual Public Authorities | | |
| Has the authority appointed an Information Officer who is responsible for RTI implementation? <i>(If yes comment on how the mandate functions)</i> | | |
| Does the authority have an RTI implementation plan? <i>(If yes, comment on the extent to which such a plan has been operationalized)</i> | | |
| Has the authority developed/ issued guidelines for receiving and responding to information requests? <i>(If yes, comment on their usage)</i> | | |
| Does the authority prepare and publish annual reports, including statistics on requests? <i>(If yes probe for the availability of the latest report and the period it relates to, otherwise any hindrances to that effect).</i> | | |
| Has the authority provided RTI training to its information officers? <i>(If yes, comment on when the most recent training programme was conducted).</i> | | |

Annex 4 - Processing of Requests

| | Date Request Submitted | How Request was Filed | Date Receipt Received | Submitted (Y/N) | Date, if any, of response | Result | How information provided | Fee charged, if any | Comments |
|-------------------------|------------------------|-----------------------|-----------------------|-----------------|---------------------------|--------|--------------------------|---------------------|----------|
| Authority 1, Question 1 | | (i) | (ii) | (iii) | | (iv) | (v) | | |
| Authority 1, Question 2 | | | | | | | | | |
| Authority 2, Question 1 | | | | | | | | | |
| ... | | | | | | | | | |

- i) Post, e-mail, fax, hand delivered
- ii) The date, if any, you receive an acknowledgement of or receipt for the request
- iii) If you were unable to submit, provide an explanation in Comments
- iv) See the list *(1 - Oral Refusal, 2-Written Refusal (in whole or in part), 3 – Transferred, 4 – Referred, 5 - Mute Refusal, 6 - Information received, 7 - Incomplete Answer, 8 - Information Not Held, 9 - Unable to Submit)*
- v) Electronic copy, hard copy, right to inspect, and so on.

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